



May 30, 2025

Hon. Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
VIA ECF ONLY

Re: *Shkolir, et al. v. RX2GO, Inc., et. al.*; 1:23-cv-7256-OEM-PK (EDNY)
MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR SETTLEMENT APPROVAL

Your Honor:

I represent the Plaintiffs in the above-referenced action. Pursuant to Your Honor's Minute Entry and Order of May 1, 2025, the deadline to file a Motion for Settlement Approval is May 30, 2025. Plaintiffs respectfully request an extension of one week to file the motion, making the motion due by June 6, 2025.

The reason for this request is that the parties have exchanged drafts of the settlement agreement and are in the process of finalizing the terms. Once the language is agreed upon by the parties, we need time to get signatures from each of the Plaintiffs and Defendants, which could take several days. Opposing counsel consents to this request.

Pursuant to the Court's individual practice standards, the following is offered:

- a. The original date to file Motion for Settlement Approval: May 30, 2025.
- b. The reason for the request: See above.
- c. The number of previous requests for adjournment or enlargement: None for this motion.
- d. Whether these previous requests were granted or denied: N/A
- e. Whether the adversary consents, and, if not, the reasons given by the adversary for refusing to consent: Opposing counsel consents to this request.

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This request is not anticipated to impact or affect any other immediate deadlines in this case.

Thank you for your consideration.

Sincerely,



Penn Dodson, Esq.

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